SURREBUTTAL TESTIMONY ON REHEARING
OF
GREG ROCKROHR

ENERGY ENGINEERING PROGRAM
SAFETY AND RELIABILITY DIVISION
ILLINOIS COMMERCE COMMISSION

Ameren Transmission Company of Illinois
Docket No. 12-0598 (Rehearing)

Petition for a Certificate of Public Convenience and Necessity, pursuant to Section 8-406.1 of the Illinois Public Utilities Act, and an Order pursuant to Section 8-503 of the Public Utilities Act, to Construct, Operate and Maintain a New High Voltage Electric Service Line and Related Facilities in the Counties of Adams, Brown, Cass, Champaign, Christian, Clark, Coles, Edgar, Fulton, Macon, Montgomery, Morgan, Moultrie, Pike, Sangamon, Schuyler, Scott and Shelby, Illinois.

December 10, 2013

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Introduction

Q. Please state your name and business address.

A. My name is Greg Rockrohr. My business address is 527 East Capitol Avenue, Springfield, Illinois 62701.

Q. Are you the same Greg Rockrohr who previously provided testimony on rehearing in this docket?

A. Yes. ICC Staff Ex. 2.0, filed on November 13, 2013, is my prepared direct testimony on rehearing. ICC Staff Ex. 3.0, filed on December 2, 2013, is my prepared rebuttal testimony on rehearing.

Q. What is the purpose of your surrebuttal testimony in this rehearing?

A. My surrebuttal testimony responds to the rebuttal testimony of various parties with respect to: (1) the Meredosia to Pawnee route alternatives; (2) the potential use of a Pawnee to Kincaid to Mt. Zion route instead of the Pawnee to Pana to Mt. Zion route that ATXI proposes; (3) the location of the Mt. Zion area substation; (4) a proposed Pawnee to Pana route modification; (5) a proposed Pana to Mt. Zion route modification; and (6) three proposed Mt. Zion to Kansas routes. I also offer clarifying comments in response to what appears to be a misunderstanding or inadvertent misrepresentation of my positions by an ATXI witness. If I exclude discussion of a specific ATXI or intervener position from my surrebuttal testimony, it should not be construed that I agree with their position.

Meredosia to Pawnee Segment Route Alternatives

Q. Has any party's rebuttal testimony on rehearing caused you to change your opinion regarding the best route for the Meredosia to Pawnee segment of ATXI's Illinois Rivers Project?

A. No. The MSCLTF alternative route is superior using the criteria that the Commission identified in its August 20, 2013, Final Order.[1] The MSCLTF alternative route that MSSCLPG supports, when compared to ATXI's Alternate Route, is approximately 21 miles shorter,[2] would be over $36 million less costly to construct,[3] and would impact far fewer landowners and residences.[4]

Pawnee to Kincaid to Mt. Zion Connection

Q. Has ATXI's rebuttal testimony caused you to change your opinion that a Pawnee to Kincaid to Mt. Zion connection likely represents the least cost route for ATXI's Illinois Rivers Project?

A. No. I continue to believe that using a Pawnee to Kincaid to Mt. Zion route instead of a Pawnee to Pana to Mt. Zion route would result in the lowest overall costs. ATXI explains its objections to using a Pawnee to Kincaid to Mt. Zion alternative route in its direct testimony on rehearing to which I respond in my rebuttal testimony on rehearing.[5] I am unaware of any new objections raised by ATXI in rebuttal testimony on rehearing.

[1] Staff Ex. 3.0, 1-4.
[2] ATXI Ex. 3.0, Table 1, 7-8.
[3] ATXI Ex. 16.3 (Rev.), 4.
[4] MSSCLPG Ex. 11.0, 3-4; MSSCLPG Ex. 11.1; and MSSCLPG Ex. 11.2.
[5] Staff Ex. 3.0, 4-11.

Q. Are you aware of any other Party's testimony regarding use of a Pawnee to Kincaid to Mt. Zion route?

A. Yes. In particular two intervening parties, Eric Sprague ("Sprague") and Ann Raynolds with Justin Ramey ("Raynolds/Ramey"), each support a Pawnee to Kincaid to Mt. Zion route because it would eliminate impacts to their respective properties. Raynolds/Ramey additionally suggest that a Pawnee to Mt. Zion connection that does not connect to Kincaid will alleviate ATXI witness Dennis Kramer's concerns about modifications at the existing Kincaid substation and be less costly.[6]

Q. What are your comments regarding Raynolds/Ramey's suggestion of a Pawnee to Mt. Zion connection rather than a Pawnee to Kincaid to Mt. Zion connection?

A. In his direct testimony on rehearing, Mr. Kramer identifies several possible connection methods at Kincaid.[7] I do not know whether bypassing Kincaid substation would alleviate Mr. Kramer's concerns, but I agree with Raynolds/Ramey that constructing a new 345 kV transmission line from Pawnee to Mt. Zion would be one way to eliminate a need to modify the existing Kincaid Substation bus. However, since when presenting Staff's alternative Pawnee to Kincaid to Mt. Zion route, I propose using AIC's existing 345 kV transmission line between Pawnee and Kincaid, I did not identify landowners who would be affected by a new transmission line between the Kincaid area and ATXI's

[6] Raynolds/Ramey Ex. 1.0, 4-6.
[7] ATXI Ex. 1.0 (RH), 12.

proposed Pawnee substation. Bypassing Kincaid Substation altogether, as suggested by Raynolds/Ramey, is a potential cost saving alternative that I did not consider, nor did ATXI, to my knowledge, explore such an alternative prior to filing its petition. Still another unexplored option for using a Pawnee to Kincaid to Mt. Zion route is for ATXI to construct a separate switchyard in close proximity to the existing Kincaid Substation that would provide terminations for the existing AIC 345 kV lines from Pawnee and Pana, and after transfer of some existing Kincaid connections, improve the operational challenges that ATXI witness Jeffrey Hackman describes.[8] The important point associated with the Raynolds/Ramey suggestion, or any of the Kincaid connection options, is that ATXI filed its petition without fully evaluating the potential costs/benefits of using a Pawnee to Kincaid to Mt. Zion route instead of the Pawnee to Pana to Mt. Zion route that it proposes. I cannot conclude that a Pawnee to Pana to Mt. Zion route is least cost when a Pawnee to Kincaid to Mt. Zion route would eliminate 25 miles of transmission line and all the impacts associated with those 25 miles of transmission line for the landowners along its path, while simultaneously providing a potential savings of over $80 million.[9] For that reason, I recommend that the Commission either exclude the Pawnee to Mt. Zion segment from any certificate it grants in this proceeding, or grant a certificate that includes a Pawnee to Kincaid to Mt. Zion route instead of a route through Pana.

[8] ATXI Ex. 2.0 (RH), 29.
[9] Staff Ex. 3.0, 10-11.

Mt. Zion Area Substation Location

Q. When discussing possible substation sites to supply the Decatur area in your direct testimony on rehearing you stated: "I hope that ATXI will provide and explain, either in supplemental responses to Staff's data requests or in rebuttal testimony, results from power flow analyses using each of the potential substation sites...[.]"[10] Did ATXI provide power flow analyses?

A. Yes. It is my understanding that ATXI Ex. 4.1 (RH) through ATXI Ex. 4.4 (RH) illustrate the results of power flow studies and show voltage conditions in the Decatur area under the contingency loss of both Oreana 345/138 kV transformers with one 345 kV connection to Pana in service. I understand that these power flow analyses model the transmission system with the segments of the project from either Pawnee or Kincaid and from Kansas out of service, as indicated by the dashed lines at the bottom of each exhibit. I understand ATXI to represent that ATXI Ex. 4.3 (RH) and ATXI Ex. 4.4 (RH) indicate that if the substation site near Moweaqua that I suggest were used, under the specific contingency modeled, voltages below ATXI's stated threshold of 95% would exist at several 138 kV bus locations in the Decatur area. ATXI concludes, therefore, that a substation site near Moweaqua that I suggest in direct testimony on rehearing is not viable.[11]

[10] Staff Ex. 2.0, 14.
[11] ATXI Ex. 7.0 (RH), 7.

Q. Do ATXI Ex. 4.3 (RH) and ATXI Ex. 4.4 (RH) convince you that the Moweaqua substation site that you suggest in direct testimony on rehearing should not be used?

A. No. These power flow studies do not appear to me to correctly model the contingency conditions that would exist following completion of the Illinois Rivers Project. Power flow study results that ATXI provided as ATXI Ex. 11.1 appropriately illustrate power flows under the contingency loss of both Oreana 345/138 kV transformers assuming that the segments of the Illinois Rivers Project on both sides of Mt. Zion are in service: Pana to Mt. Zion and Mt. Zion to Kansas. It is my belief that the additional 345 kV connection(s) would result in less voltage drop at the 345 kV bus, and therefore higher voltage on the 138 kV supplying the Decatur area. For ATXI's power flow studies illustrated by ATXI Ex. 4.1 (RH) through ATXI Ex. 4.4 (RH), it appears ATXI assumes only a single 345 kV connection from Pana, with connecting segments of the Illinois Rivers Project Kincaid to Mt. Zion and Mt. Zion to Kansas out-of-service.

I am concerned, therefore, that the power flow results illustrated by ATXI Ex. 4.3 (RH) and ATXI Ex. 4.4 (RH) likely indicate voltages lower than would actually exist in the Decatur area after a 345 kV connection is established from Kansas and from Kincaid. I recommend that ATXI amend or supplement the power flow results that it provides with ATXI Ex. 4.0 (RH) to show the Decatur area 138 kV bus voltages that would exist with a Kincaid to Mt. Zion to Kansas 345 kV segment in service, as would actually be the case if a Pawnee to Kincaid to Mt. Zion to Kansas route were used and a loss of both Oreana 345/138 kV

transformers occurred. Since the power flow studies illustrated by ATXI Ex. 4.3 (RH) and ATXI Ex. 4.4 (RH) do not represent the conditions that would actually exist if the Pawnee to Kincaid to Mt. Zion connection is used, I cannot conclude that the result proves or disproves the viability of the substation site near Moweaqua that I suggest. Any updates to ATXI Ex. 4.3 (RH) and ATXI Ex. 4.4 (RH) that ATXI provides should use the same loading assumptions for Decatur area as used in ATXI Ex. 4.1 (RH) through ATXI Ex. 4.4 (RH) and ATXI Ex. 11.1.

Q. Mr. Kramer cautions that your reference in direct testimony to ATXI's power flow analysis discussed in ATXI Ex. 11.0, which is illustrated by ATXI 11.1, is not applicable to the Kincaid connection.[12] How do you respond?

A. I agree with Mr. Kramer that the power flow study discussed in ATXI Ex. 11.0 that is illustrated by ATXI Ex. 11.1 did not consider a substation location near Moweaqua. Even so, it is useful to reference the power flow study results illustrated by ATXI Ex. 11.1. Under the same contingency conditions, this power flow study, which assumes two 30-mile 138 kV lines, results in higher voltages on AIC's 138 kV system in the Decatur area than the power flow study results illustrated by ATXI Ex. 4.4 (RH), which assumes two much shorter 138 kV lines. Since voltage drop on transmission lines is generally proportional to the transmission line impedance, the shorter of two otherwise identical transmission lines that supply the same load should result in less voltage drop. I am unable to reconcile the power flow study results illustrated by ATXI Ex. 4.4 (RH) and ATXI Ex. 11.1 because the opposite result occurs. For example, ATXI Ex. 11.1 shows

[12] ATXI Ex. 4.0 (RH), 9-10.

that the voltage at the Oreana 138 kV bus following loss of both 345/138 kV transformers at Oreana would be at 93.40%. ATXI Ex. 4.4 (RH) shows that with much shorter 138 kV lines from a 345/138 kV substation near Moweaqua and the same contingency conditions, the voltage at the Oreana 138 kV bus would be 92.92%. The shorter 138 kV lines with lower impedance from the Moweaqua site should produce higher voltage than the hypothetical 30-mile long 138 kV lines ATXI assumed in ATXI Ex. 11.1. I very much appreciate that Mr. Kramer provided the power flow study result illustrations in ATXI Ex. 4.1 (RH) through ATXI Ex. 4.4 (RH), but, as I previously stated, it appears to me that these studies consider only a single 345 kV source from Pana to supply the hypothetical 345/138 kV substation near Moweaqua rather than the 345 kV connections from Kincaid and Kansas that would actually exist. Therefore, ATXI Ex. 11.1 is useful for explaining why ATXI Ex. 4.3 (RH) and ATXI Ex. 4.4 (RH) do not demonstrate to me that a substation site near Moweaqua would be unsuitable.

Q. Do you have additional comments regarding proposed Mt. Zion substation sites?

A. Yes. ATXI has indicated that, regardless of which Mt. Zion substation site is selected, AIC will install either one or two 138 kV lines to the PPG Plant substation in Mt. Zion.[13] In Docket 12-0080, I pointed out the advantages of using common structures to support both the 138 kV conductors that AIC sought authority to install in that proceeding and the 345 kV conductors between Sidney to Rising that ATXI seeks to install as part of the Sidney to Rising segment of this

[13] ATXI Ex. 4.1 (RH) to ATXI Ex. 4.4 (RH).

docket.[14] As it did in Docket 12-0080, the Commission should require ATXI to utilize double circuit structures for its 345 kV transmission line in locations where the ATXI 345 kV route and AIC 138 kV route will be the same. AIC is not a party in this docket, and the route for AIC's 138 kV lines are not being considered in this docket, but that fact does not prevent ATXI and AIC from capturing cost savings associated with sharing structures for new lines to be constructed on the same route. For example, for either ATXI's proposed Mt. Zion substation site or Staff's Option #1 or #2 sites, it appears to me that a reasonable option could be for ATXI and AIC to share several structures west of the substation sites to approximately Karl Rd. For Staff's Option #1 or Option #2 site, an additional option might be for ATXI and AIC to share structures north along Henry Rd. For Staff's Option #3 site, since ATXI states that AIC would likely need to rebuild the line to Moweaqua, AIC and ATXI could share double circuit structures east of the substation to Hwy 51. The specific structures that can be shared by ATXI and AIC will not be identifiable until AIC files its petition to extend 138 kV lines from the Mt. Zion substation site to the PPG plant, but I recommend that if the Commission's order on rehearing establishes a Pawnee to Mt. Zion route, it also require ATXI to use structures capable of supporting both the 345 kV and 138 kV transmission lines whenever doing so would reduce impacts on area landowners and not impose unacceptable reliability risks.

[14] Docket 12-0080, Staff IB, 6-7.

Pawnee to Pana Segment Route Alternatives

Q. Did any party propose a new alternative for a Pawnee to Pana route segment in rebuttal testimony on rehearing?

A. Yes. Though I understand that Raynolds/Ramey primarily supports a direct route from Pawnee to Mt. Zion, Raynolds/Ramey also proposes a modification to ATXI's Alternate Route 2 should the Commission determine that ATXI is to construct its proposed 345 kV transmission line between Pawnee and Pana. As shown on Raynolds/Ramey Ex. 1.1, the Raynolds/Ramey alternative route would modify ATXI's Alternative Route 2 by angling south from CR 1025N, east of Hwy 48, and paralleling an existing AIC 345 kV and 138 kV transmission line until rejoining ATXI's Alternate Route 2 east of CR 1250E. Raynolds/Ramey compares ATXI's Alternate Route 2 with the modification to ATXI's Alternate Route 2 without the modification using the criteria that the Commission identified in its August 20, 2013, Final Order, and concludes that ATXI's Alternate Route 2 with the route modification is superior.[15]

Q. What is your opinion regarding the Raynolds/Ramey modification to ATXI's Alternate Route 2?

A. I do not support a route from Pawnee to Pana, but if the Commission determines ATXI should construct its project on this segment, I support the modification to ATXI's Alternate Route 2 that Raynolds/Ramey proposes. The Raynolds/Ramey modification is somewhat shorter and would cost less to construct while simultaneously placing the line farther from several residences. I do not know

[15] Raynolds/Ramey, 9-16.

whether prior notification has been given to all landowners who would be affected by the Raynolds/Ramey modification. If notification did not occur, I do not know how that fact would affect the Commission's ability to use the Raynolds/Ramey modification.

Pana to Mt. Zion Segment Route Alternatives

Q. On page 4 of ATXI Ex. 6.0 (RH), ATXI witness Donell Murphy proposes a route between Pana and Mt. Zion that would follow ATXI's Primary Route north from Pana until meeting Staff's alternative route, then follow Staff's alternative route to Staff's proposed Option 1 or Option 2 substation site. Do you have any comments regarding this proposal?

A. I continue to support a Pawnee to Kincaid to Mt. Zion connection rather than a route from Pawnee to Pana to Mt. Zion, and, for the reasons I have previously provided, I am not convinced that my preferred substation site near Moweaqua is not viable. Nonetheless, if the Commission determines that ATXI should install its proposed transmission line from Pawnee to Pana to Mt. Zion, then I would not object to Ms. Murphy's proposal.

Q. Did any other party identify an alternative route for a Pana to Mt. Zion route segment?

A. Yes. Mr. Sprague notes that ATXI's Primary Route in the area of his property passes very close to several residences.[16] Of particular concern to me is the residence identified as L. Zindel on Sprague Ex. 1.4, located on CR 2400E north of CR 1900N, because ATXI's Primary Route borders this residence on two

[16] Sprague Ex. 1.0, 5-6.

sides. I concur with Mr. Sprague that the jog that ATXI has placed in its Primary Route results in a longer route that appears to impact several additional residences while also adding to construction costs. Mr. Sprague proposes three alternative routes, the simplest of which would continue to parallel AIC's existing 138 kV line, rather than jog to the west. I do not believe that adequate space exists for ATXI to parallel AIC's existing 138 kV line north of CR 1900N unless ATXI displaces a residence or ATXI and AIC share the easement and two structures. As with the alternative route proposals from Raynolds/Ramey, I do not know whether notification of affected landowners occurred, or whether omission of notifications to affected landowner would preclude ATXI from using any of Mr. Sprague's alternative route suggestions. If it would not, and if the Commission approves a Pawnee to Pana to Mt. Zion segment despite my recommendation that it not do so, Ms. Murphy's alternative route proposal in combination with Mr. Sprague's alternative 3, shown on Sprague Ex. 1.4, would be the superior route, as illustrated by the table that Mr. Sprague identifies as Sprague Ex. 1.5.

Mt. Zion to Kansas Segment Route Alternatives

Q. What Mt. Zion to Kansas segment routing proposals must the Commission consider in rehearing?

A. I am aware of three, two of which use combinations of ATXI's Primary and Alternate Routes. ATXI and MCPO continue to recommend the MCPO MZK route to which they stipulated, with a potential adjustment on the west end of the route to accommodate Staff's alternate route from Pawnee to Kincaid to Mt. Zion,

if required. The Coalition of Property Owners and Interested Parties in Piatt, Douglas and Moultrie Counties ("PDM") with Channon Family Trust ("CFT") jointly recommend a combination of ATXI's Primary and Alternate routes.[17] In my direct testimony, I also suggest that, if Staff's alternative route from Pawnee to Kincaid to Mt. Zion is used, the lowest cost route for the Mt. Zion to Kansas segment would likely be realized by using a combination of ATXI's Primary and Alternate routes, though I do not propose exactly the same combination as PDM/CFT.[18]

Q. Have you considered the three route proposals discussed above (MCPO/ATXI, PDM/CFT, Staff) using the 12 routing criteria that the Commission listed on page 15 of its August 20, 2013, Final Order?

A. Yes. Below is a discussion of only those criteria for which I am aware of differences between any of the three routes:

1 Length of the line

The PDM/CFT Route and Staff route proposals would be approximately the same length and shorter than the ATXI/MCPO Route. Using the information ATXI provided on page 2 of ATXI Ex. 5.1 (RH), ATXI's proposed substation site and route would result in a distance of 69.2 miles. Adding a distance of about 1.5 miles to adjust for use of Staff Mt. Zion Substation site Option #1 (the Option #1 site is 3 miles south minus 1.5 miles east of ATXI's proposed substation site), the length of the MCPO/ATXI route would be 70.7 miles. ATXI Ex. 5.1 (RH) also

[17] PDM Ex. 6.0, 4.
[18] Staff Ex. 2.0, 15.

indicates that the PDM/CFT Hybrid Route from ATXI's proposed Mt. Zion substation site is 66.15 miles. Subtracting about 4.5 miles to adjust for use of Staff Mt. Zion Substation site Option #1 (the Option #1 site is 3 miles south plus 1.5 miles east of ATXI's proposed substation site) would result in a PDM/CFT or Staff route length of about 61.65 miles. Thus, based upon ATXI Ex. 5.1 (RH), the ATXI/MCPO route would be approximately 9 miles longer than the PDM/CFT Route if Staff's Mt. Zion Substation site Option #1 is used, and about 3 miles longer if ATXI's proposed Mt. Zion substation site is used. Again, the route I suggested in direct testimony on rehearing would be roughly the same length as the PDM/CFT Route. Since Staff's alternative route would be the same if Staff substation Option #3 is used, use of Staff substation site Option #3 would result in the same route lengths for the Mt. Zion to Kansas segment as use of Staff substation site Option #1.

2 Difficulty and cost of construction

ATXI Ex. 5.1 (RH) indicates baseline costs for the ATXI/MCPO Route of about $1,915,188 per mile, which equates to $135,403,791 for 70.7 miles. ATXI Ex. 5.1 indicates costs for the PDM/CFT Route of about $1,927,962 per mile, which equates to $118,473,265 for 61.65 miles. Based upon this approximation, the PDM/CFT Route baseline cost would be about $16.9 million less than the ATXI/MCPO Route using Staff's Mt. Zion Substation site Option #1 or Option #3, and about $5 million less using ATXI's proposed substation site.[19] The cost of

[19] The cost estimates on page 1 of ATXI Ex. 5.1 (RH) also suggest that use of Staff substation site Option #1 for a Pana to Mt. Zion route segment and a hybrid route suggested by ATXI witness Murphy would

297 the route that I suggest in direct testimony on rehearing would be only slightly
298 lower than the PDM/CFT Route cost because it would require two fewer dead-
299 end structures.

300 8 Proximity to homes and other structures

301 The hybrid routes that PDM/CFT and Staff propose would cause the
302 transmission line to be closer to more residences and structures. Specifically,
303 after reviewing the three routes using internet-based aerial maps, I found the
304 ATXI/MCPO Route to be in close proximity to only three residences regardless of
305 whether ATXI's proposed Mt. Zion substation site or Staff's alternative route from
306 Pawnee to Kincaid to Mt. Zion is selected:

307 • A residence across Sulphur Spring Rd. from ATXI's proposed substation
308 site – if ATXI's proposed Mt. Zion substation site is used.

309 • A residence on Henry Rd. south of Wheeler Rd. in Moultrie County - if
310 Staff's Mt. Zion Substation site Option #1 is used in combination with the
311 ATXI/MCPO route.

312 • A residence on the south side of County Hwy 60 east of the Hwy 60
313 intersection with Hienz Rd, in Moultrie County

314 • A residence on the west side of CR 2700E north of CR 1720N, in Coles
315 County.

result in a baseline cost that is about $3.9 million lower than it would be if ATXI's proposed substation site were used.

I found the PDM/CFT Hybrid Route and the hybrid alternative that Staff proposed to be in close proximity to 15 residences. Residences were common to both routes, except as noted:

- Two residences on CR 1900N between CR 400E and CR 500E, in Moultrie County.
- A residence on CR 800E south of CR 1850N, in Moultrie County.
- Two residences on Cushman Rd., one north and one south of CR 1750N, in Moultrie County - if the PDM/CFT Hybrid Route is used.
- A residence on Murphy Rd. east of Eagle Pond Rd., in Moultrie County - if Staff's proposed hybrid route is used.
- A residence on Cooks Mill Rd west of CR 1625E, in Moultrie County- if Staff's proposed hybrid route is used.
- Two residences along County Hwy 2 east of CR 1625E, in Moultrie County
- Two residences on CR 1500N west of CR 250E, in Coles County.
- A residence on CR 1500N at the Kaskaskia River crossing, in Coles County.
- A residence on CR 700E south of CR 1480N, in Coles County.
- A residence on CR 800E north of CR 1480N, in Coles County.
- Two residences near the intersection of CR1470N and CR 2300E, in Coles County.
- A residence east of CR 2350E and south of CR 1470N, in Coles County.

9 Proximity to existing and planned development

In addition to the residences described above, the PDM/CFT Route, following ATXI's Primary Route, passes through a development area along Hwy 121, east of the community of Sullivan, as shown on ATXI Ex. 4.2, Part 70, page 1. The existence of this development area is the primary reason I propose a different route combination in direct testimony on rehearing that uses ATXI's segment option shown on ATXI Ex. 4.2, Part 69, page 2, to connect ATXI's Primary Route to ATXI's Alternate. Use of ATXI's proposed substation site would cause the ATXI/MCPO Route to pass through a planned development area identified by the Village of Mt. Zion. This Mt. Zion development area would be avoided if any of Staff's suggested substation sites is used.

12 Presence of existing corridors

The ATXI/MCPO Route parallels existing AIC transmission lines for several miles north of Kansas.

Q. What did you conclude regarding the Mt. Zion to Kansas segment after considering the above 12 criteria?

A. I recommend that, if the Commission elects to select a route between Mt. Zion and Kansas based upon the evidence in this proceeding, the Commission order ATXI to use the ATXI/MCPO Route. Though more costly to construct, this route appears to me to be the best choice of the three routes discussed above. There are negative aspects associated with each of the three route options. The ATXI/MCPO Route is longer than the others because, after leaving the Mt. Zion area, it extends several miles to the north prior to turning east and south to reach

Kansas. The PDM/CFT and Staff hybrid route proposals use combinations of ATXI's Primary and Alternate Routes that are in close proximity to more residences than is the ATXI/MCPO Route. Given time for greater research, parties might develop better transmission line routes between Mt. Zion and Kansas than those presented in this docket. Given the three routes under consideration, the Commission must choose between more expensive initial construction and additional line length versus more numerous impacts to landowners in the form of proximity to structures, including residences.[20]

Clarifications

Q. Do you have any additional clarifying comments?

A. Yes. I believe three statements in ATXI witness Maureen Borkowski's rebuttal testimony on rehearing require comment. First, Ms. Borkowski's testimony could be interpreted as stating that I suggest that a new separate proceeding could be needed to resolve the route for Pawnee to Pana to Mt. Zion to Kansas to Sugar Creek.[21] That is not what I suggest, as all those segments are not subject to rehearing. I suggest that a new separate proceeding could be utilized to resolve the routing for the portions of MISO MVP # 10 and 11 between Pawnee and Kansas. Furthermore, since AIC will need a separate proceeding to receive a certificate prior to constructing the connecting 138 kV lines in the Decatur area, I suggest that AIC and ATXI should jointly participate in that new separate proceeding so that routing for the 345 kV and 138 kV transmission lines near

[20] MCPO Ex. 2.0, 6: MCPO witness Mr. Rudolph Reinecki states that the PDM/CFT Route could result in relocation of 6 structures that are within 75 feet of the centerline of the route.
[21] ATXI Ex. 7.0 (RH), 2.

Decatur, both of which are included as part of the MISO MVP, can be considered simultaneously.

Second, when explaining her understanding of my position regarding the connection through Kincaid, Ms. Borkowski states, without citation, that I testified that fewer landowners are affected because the Kincaid route parallels existing distribution lines.[22] I am unaware of such testimony, and believe Ms. Borkowski either may have misinterpreted my testimony or inadvertently attributed to me the testimony of someone else.

Finally, Ms. Borkowski states that a Pana to Mt. Zion connection would not be part of the MISO MVP if it were to be put in service prior to a Kincaid connection.[23] If the Commission were to order ATXI to complete a Pawnee to Kincaid to Mt. Zion connection instead of a Pawnee to Pana to Mt. Zion connection, and such an order caused ATXI to have concerns regarding 345 kV support to the Decatur area, I do not understand why ATXI would construct a Pana to Mt. Zion connection that was not part of the MISO MVP prior to completing the Kansas to Mt. Zion connection that was part of the MISO MVP. In addition, Ms. Borkowski did not explain why or how she knows that such a connection from Pana, if constructed, would not be part of the MISO MVP.

Q. Does this question conclude your prepared rebuttal testimony on rehearing?

A. Yes it does.

[22] *Id.*
[23] *Id.*, 5.